

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA)
)
 v.) Docket No. 2:17-cr-005-2
)
SAQUON MOORE)

EMERGENCY MOTION FOR COMPASSIONATE RELEASE

NOW COMES, Defendant Saquon Moore, by and through undersigned counsel, and respectfully requests that the Court order his compassionate release under 18 U.S.C. § 3582(c)(1)(A)(i) due to the “extraordinary and compelling reasons” confronting the federal prison system by the COVID-19 pandemic. Mr. Moore is at significant risk of contracting and developing severe complications from an exposure to COVID-19 due to his asthma,¹ and accordingly this pandemic has created extraordinary and compelling reasons for his release.

In support of his motion, Mr. Moore represents the following:

1. On April 30, 2018, the Court sentenced Mr. Moore to 63 months imprisonment, to be followed by 4 years of supervised release.
2. Mr. Moore is currently residing at the Coolidge House Residential Reentry Center in Boston, Massachusetts. The Coolidge House has approximately 120 inmates.² Such a significant population will inevitably make it more difficult to engage in the social distancing that will be critical to Mr. Moore’s health.

¹ These conditions are discussed in Mr. Moore’s presentence report at ¶ 71

² See www.rip.uscourts.gov/sites/rip/files/coolidgehousehandbook.pdf

3. Extraordinary events that could not have been foreseen at the time of sentencing have made his current state of confinement extremely dangerous to Mr. Moore. The Court is well aware of the significant spread and danger of COVID-19 resulting in a worldwide pandemic and a national emergency in the United States. The Centers for Disease Control and Prevention (“CDC”) have issued guidance related to the deadly effects of COVID-19 on certain high-risk patients of the population. The CDC identified the population most at risk of death from the disease to include adults of any age with underlying medical conditions, including people with disease to include adults of any age with underlying medical conditions, including people with diabetes and other chronic illness. For these individuals, the CDC warned to take immediate preventative actions, including avoiding crowded areas and staying home as much as possible.³

4. Mr. Moore is detained at a densely populated residential facility, and is particularly vulnerable to complications from COVID-19 due to his asthma.

5. Given that Mr. Moore suffers from an underlying health issue that make him exceptionally vulnerable to COVID-19, compelling and extraordinary circumstances exist to support compassionate release at this unique time in our country’s history.

6. On May 13, 2020, Mr. Moore exhausted his administrative remedies when his request for compassionate release was denied by the Bureau of Prisons. *See* Attached Exhibit A, email from Chad Fultz denying Mr. Moore’s compassionate release request.

7. Mr. Moore can live with family upon his release.

³ People Who Are At Risk For Serious Illness From COVID-19, Ctrs. For Disease Control & Prevention (Mar. 31, 2020) www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html.

WHEREFORE, based on the foregoing, Mr. Moore respectfully requests that the Court grant this Motion for compassionate release.

DATED at Burlington, Vermont this 20th day of May, 2020.

Respectfully submitted,

SAQUON MOORE

/s/ Brooks G. McArthur

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